IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA **CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

LITIGATION

ETHICON ELECTION WAVE CASES LISTED IN EXHIBIT A TO PLAINTIFFS'

NOTICE OF ADOPTION

Master File No. 2:12-MD-02327 MDL 2327

> JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE REGARDING SAMANTHA J. PULLIAM, M.D. FOR ELECTION WAVE

Plaintiffs filed a Notice of Adoption (Doc. No. 7304) in the Ethicon Election Wave cases identified in Exhibit A to their Notice adopting their prior *Daubert* Motion to Preclude Testimony of Defense Expert Samantha J. Pulliam, M.D. and Supporting Memorandum from Ethicon Wave 4. See Doc. No. 7304 (adopting Doc. Nos. 3623 (motion), 3627 (memorandum), and 3860 (reply)). Defendants hereby adopt and incorporate by reference their *Daubert* response filed in relation to Samantha J. Pulliam, M.D. in Ethicon Wave 4, Doc. No. 3764. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in their Wave 4 response brief.

Dated: December 27, 2018

Respectfully submitted,

/s/ Susan M. Robinson

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COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/s/ Susan M. Robinson

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